January 31, 1999

James L. Colter
Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, MS #82
Lester, PA 19113-2090

Dear Mr. Colter,

SUBJECT: Phase 2 RCRA Facility Investigation

Those members of the RAB that provided input to these comments include: Lou Cork, Lorraine Collins, Bill Gunther and myself. Anne Miloski reviewed the comments and supports them. The submission of these comments does not preclude RAB members from submitting additional comments.

General comments

1) There was discussion at the 12/15 Steering Committee meeting as to what standard should be achieved through remediation. It was agreed by those present (Collins, Cork, Gunther & Johnson) that the standard for residential use should be used as the clean-up goal for all sites.

2) The sections were written differently and information given in some sections was more detailed than in other sections. This made review difficult. The format of each section should be the same with information presented by media (soil, sediment, groundwater), then health and ecological impacts for each given.

3) There should be a list of acronyms at the beginning of this, and future documents.

Site 1 - Northeast Pond Disposal Area

Page 2-57, conclusion 2
It is stated in this conclusion that thallium may not be a site contaminant, however, it is also stated that thallium did exceed groundwater standards. It should be determined conclusively whether in fact thallium occurs naturally at the site. In a preliminary data screening in 1992 (See attached Table 5-1, Draft Site Investigation Report, January 1992) no thallium was detected in soils. Why is it now showing up in groundwater?

If thallium is background, explain the reasons for the extreme variations in test results at contaminated sites -

NP-MW02, Aug 94, 12.4 ug/l

NP-MW04, Jun 97, 5.8
NP-MW05, Jun 97, 3.6
FT-MW02-S, Mar 95, 3.5
FT-MW02-I, Mar 95, 6.3

(Will be interested to see your response to the NYSDEC comment on Thallium.)

Page 2-58, conclusion 7
This conclusion, that the chemicals in soil and sediment are not adversely impacting groundwater quality, is not supported by statements within the section. On page 2-11, it is stated that State **groundwater quality standards have been exceeded** by 10 chemicals. On page 2-13 it is stated that federal and state **drinking water standards have been exceeded** by the same 10 "chemical concentrations," and that "the risk assessment has identified the soils **and groundwater at the Northeast Pond Disposal Area site to pose unacceptable human health risks...**"

Given the extent of the contamination at this site, particularly the concentrations of PCBs listed in the sediments in Figure 2-4, a remediation solution that calls only for groundwater monitoring is not acceptable. The Corrective Measures Study for this site must consider excavation and removal of the contaminated soil for the disposal offsite and should also include the evaluation of active groundwater treatment alternatives.

Site 2 - Fire Training Area

Page 3-1, paragraph 3
It is stated that the water table is located 10 - 15 feet below grade. It should be noted that in Table 3-2 the depth to water in MW08 was less than 8 feet. While most of the wells did show a depth to within this distance, further work is necessary to obtain accurate, detailed information. This discrepancy and the notoriously variable water table across the entire area supports the need for a dependable, current groundwater map.

Page 3-2, first paragraph
The statements in this paragraph are somewhat confusing "... A free product recovery system operated until 1993 when the system was shut down. Then, it is stated that free product recovery has continued from the shallow monitoring wells until 1996. Finally, it is stated that 270 gallons of petroleum product was recovered as of December 1993..." Is this an error? Should it be December 1996? Or was the amount recovered from the shallow monitoring wells too insignificant to be measured?

Page 3-3, paragraph 4
It is stated that there is no information available on the irrigation well, yet statements about that well were made at our November meeting. If information is available, it should be added to the report.

Page 3-4, first paragraph
It is stated that "25,000 pounds of organics have been destroyed through biodegradation." Additional information on how this estimate was obtained should be included. If the estimate is supported by testing or analyses, that too should be included. And, if there are supporting analyses, why such a wide variable in the reduction of VOC concentrations (70 to 95 percent)?

Page 3-6, fifth bullet
Sorry, can't help noting that "one" drum was found at this site, too. Just out of curiosity, are there records that show that chemicals or hazardous wastes were stored in drums anywhere onsite, and how if they were, are there documents showing proper disposal?

Page 3-16, paragraph 3
It is stated that soil sample results are "included in Appendix C." There is no Appendix C (or any other appendices referrenced) in the document, nor are any appendices listed in the Table of Contents. This made it rather difficult to review sample results.

Page 3-16, paragraph 4
It isn't clear that the statement "the extent of groundwater contamination is defined and currently does not extend off site" is a reliable conclusion (Also conclusion #1, page 3-30). The EPA was justified in their comment that the offsite sampling conducted was not adequate. If fact, it is somewhat ironic that the Navy response to the EPA claims that "...missing small ribbons or pockets of contaminated groundwater..." is unavoidable, after making the acknowledgment in conclusion #2 on page 3-30, that the contamination at this site is "...not contiguous, but pockets of discrete contamination..." This is all the more reason that additional offsite sampling at closer intervals with wells located closer together is needed.

It should be noted that Figure 3-1 is not to scale, therefore, it is difficult to determine exactly where the GC-TWs are located in relation to the permanent monitoring wells at the FT site.

Page 3-21
Referrence is made to additional appendices that have not been included with this document.

Page 3-30, Conclusions
Soil and groundwater pollution at the FT area and vicinity is well documented. Among the contaminants found, high levels of VOCs (particularly solvents) were detected in FT-MWs 05-S and 08-I, which are located at the fenceline, in 1994, '95 and '97. It is stated on page 3-7 that

"...VOC contamination to the south (offsite) and east is not completely characterized..." In order to address this data gap 4 temporary monitoring wells were drilled.

Given the extent of the contamination at this site, the previous comments on the Draft RCRA Facility Investigation Report from regulators including the NYSDOH and EPA regarding offsite testing, the Navy's position that "...contamination is likely to exist offsite..." stated in a response to EPA comments (See attached), and EPA and NYSDEC comments on this report, it seems that concluding that "...groundwater contamination does not extend offsite..." based on one-time testing of 4 wells drilled and sampled at questionable depths is in itself a highly questionable conclusion. I reiterate the comment made above, additional offsite testing needs to be done.

Concurrent with drafting a CMS to address overall soil and groundwater remediation, additional offsite testing should be conducted, and free-product recovery should resume immediately.

Site 7 - Fuel Depot

Page 4-2, paragraph 2
Several storage tanks are described. Are the remaining tanks scheduled for removal? If so, when? If not, do they meet Suffolk County Health Codes (Articles 6 and 12)?

paragraph 4
This paragraph is very confusing. Certainly wells have been installed since May of 1989, and while maybe there was no direct remediation of soils or groundwater, 114 gallons of petroleum were removed from this site as of December 1993, which counts for something -- unless it was simply pumped out of the storage tanks and "removed." Please clarify.

Page 4-3, last paragraph
It is stated that spills have been documented at the fuel depot. Information (at least a total figure) on these spills should be given.

Page 4-4, bullet 5
How much additional free-product was recovered between 1993 and 1996?

Page 4-6, first bullet
In 1992, the results of the analysis on lead were 11.8 to 692 ug/l and 25 ug/l was detected in FDMW -06 during testing in Mar '95. The effort should be made to get a good sample and evaluate the risk.

Page 4-13
Can't review soil samples because there's no Appendix C.

Page 4-16, Table 4-2
Site 7 is not the Fuel Calibration Area, this title should be corrected.

Concur with the NYSDEC comment that well #FDMW-07 may not be deep enough to intersect contamination.

Page 4-19, paragraph 3
The very last sentence states that "... based on the data collected...the extent of the groundwater contamination is adequately defined...," however, the sentence directly above states that "...Figure 4-2 depicts the estimated extent of groundwater contamination..." If the results in Figure 4-2 only show an estimate, then clearly additional sampling is required.

Page 4-24
Conclusion 1 is not supported given the depth of monitoring well 07. Additional testing is necessary to determine the extent of groundwater contamination.

Recovery of the free-product should resume immediately.

Sincerely,

Sherry Johnson, Community Co-chair
Calverton Restoration Advisory Board

Attachments:
As stated

cc: J. McCullough, NYSDEC
S. Farkus, NYSDEC
J. Pim, SCDHS
Riverhead Town Board

TABLE 5-1

BACKGROUND CONCENTRATIONS
FOR INORGANIC CHEMICALS IN SOILS
SITE INVESTIGATION
NWIRP CALVERTON, NEW YORK

PARAMETER	CONCENTRATION (mg/kg)
Aluminum	12,600
Antimony	None detected <6.2
Arsenic	3.6
Barium	35.1
Beryllium	None detected <0.96
Cadmium	None detected <1.2
Calcium	621
Chromium	14.5
Cobalt	6.7
Copper	5.2
Iron	15,700
Lead	14.3
Magnesium	1,740
Manganese	177
Mercury	0.15
Nickel	5.5
Potassium	690
Selenium	None detected <1.3
Silver	None detected <0.31
Sodium	209
Thallium	None detected <0.82
Vanadium	24.9
Zinc	23
Cyanide	None detected <2.6